

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	UOP, LLC	AI #:	17846	TEMPO Activity No:	PER2008008
Facility Name:	Shreveport Plant	Remarks Submitted by:	Loree Fields, URS Corporation		
Permit Writer:	Hassan Ghosn	Permit Writer Email address:	Hassan.Ghosn@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Section III Air Permit Briefing Sheet (Description) – List of permitted emissions before and after this permit action	The change in Total TAPs should be equal to -4.797 tpy (instead of -2.937). This difference is listed in two locations in this section; it is listed correctly in the second location.	Correction is made.
Section IX Air Permit Briefing Sheet (Insignificant Activities)	The spent caustic tank should be “SV-140-126” instead of “SV-140-26”	Typo is corrected.
Table 1. Applicable Louisiana and Federal Air Quality Requirements – Louisiana Requirements Table	For EQT 031 (Emission Point 240-11 - Phosphoric Acid Tank), the “3” should be moved from the LAC 33:III.Chapter 15 column to the LAC 33:III.2103 column.	Change is done.

	For the "Organic Liquid Storage Vessels – EQT009, EQT010, EQT011, EQT012, EQT013, EQT023, EQT024, EQT037, EQT038, EQT042, and EQT043" Source Type/Emission Point ID combination, the reason for non-applicability of NSPS Subpart K should be: "Storage tanks were constructed, reconstructed or modified prior to June 11, 1973." The reason for the non-applicability of NSPS Subparts Ka and Kb is because of the age of these tanks (constructed prior to June 11, 1973 and not reconstructed or modified since that time).	Change has been made, consistent with the language of the Standards, as follows: - Subpart K - Storage vessel was not constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978,
Table 2. Explanation for Exemption Status or Non-Applicability of a Source	For the "Process Vessel(s)" Source Type, change "...and are not operated as vessels" to "...and are not operated as storage vessels."	- Subpart Ka - Storage vessel was not constructed, reconstructed, or modified after May 18, 1978 and prior to July 23, 1984, and - Subpart Kb - Storage vessel was not constructed, reconstructed, or modified after July 23, 1984.
Inventories	<i>Explanation – This is a correction to a typographical error.</i> Fee No. 0460 should be removed from the list of Annual Maintenance Fees. This fee code is for Aluminum Sulfate production. All aluminum sulfate tanks and this fee code were removed from the permit when the V4 permit was approved in December 2008.	Request is granted.
Emission Rates for Criteria Pollutants	For RLP0009, the average lb/hr emission rate of NOx should be 0.24 lb/hr (instead of 0.254). <i>Explanation – This is a correction to a typographical error.</i>	Updated as requested.
Specific Requirement 81 (for EQT0019)	Change "weekly" to "daily" in this specific requirement.	Change is not necessary. Two decimal is adequate.
Specific Requirements for EQT0056 (Emission Point 330-01-A)	Request that all NSPS Subpart Dc requirements be deleted. <i>Explanation: EQT0056 is not subject to NSPS Subpart Dc.</i>	Change is made.
Specific Requirement 308 (for FUC0003)	Request that this requirement be changed to "pH<=7.75 s.u." <i>Explanation: This source is the Waste Water Pond Area Fugitives; the pond must be maintained at a pH of less than or equal to 7.75 at all times.</i>	Updated as requested.